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UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF CALIFORNIA

July 2007 Grand Jury

UNITED STATES OF AMERICA, Plaintiff, v. MAYRA ALEJANDRA ZEPEDA (1), EVELYNE RUIZ (2), PEDRO LEONIDES GUZMAN-ROSAS (3), Defendants.	Criminal Case No. ____________ I N D I C T M E N T Title 18, U.S.C., 371 - Conspiracy; Title 8, U.S.C., Sec. 1324 (a)(2)(B)(ii) - Conspiracy to Bring in Illegal Aliens for Financial Gain; Title 8, U.S.C., Sec. 1324(a)(2)(B)(ii) - Bringing in Illegal Aliens for Financial Gain; Title 18, U.S.C., Sec. 2 - Aiding and Abetting; Title 8, U.S.C., Sec. 1324 (a)(1)(A)(ii) and (v)(II) - Transportation of Illegal Aliens and Aiding and Abetting

The grand jury charges:

Count 1

Beginning at a date unknown to the grand jury and continuing up to and including August 15, 2008, within the Southern District of California, and elsewhere, defendants MAYRA ALEJANDRA ZEPEDA, EVELYNE RUIZ and PEDRO LEONIDES GUZMAN-ROSAS, with the intent to violate the immigration laws of the United States, did knowingly and intentionally conspire together and with each other and with other persons unknown to the grand jury, to bring illegal aliens into the United States for

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the purpose of commercial advantage and private financial gain; in violation of Title 8, United States Code, Section 1324(a)(2)(B)(ii) and Title 18, United States Code, Section 371.

OVERT ACTS

In furtherance of said conspiracy and to accomplish the objects thereof, the following overt acts, among others, were committed by the conspirators within the Southern District of California:

1. On or about August 13, 2008, PEDRO LEONIDES GUZMAN-ROSAS led a group of Mexican citizens with no documents to enter the United States, including Noel Astorga-Mendosa, Juan Antonio Macias-Gallo, and Joel Flores-Chamorro, from Mexico into the United States of America on foot.

2. On or about August 15, 2008, MAYRA ALEJANDRA ZEPEDA drove from the Los Angeles, California area to the Brawley, California area.

3. On or about August 15, 2008, at approximately 10:50 p.m., MAYRA ALEJANDRA ZEPEDA drove a vehicle into the United States Border Patrol checkpoint on Highway 78 near Palo Verde, California.

4. On or about August 15, 2008, at approximately 11:00 p.m., EVELYNE RUIZ as driver, and PEDRO LEONIDES GUZMAN-ROSAS as passenger, drove a vehicle, which contained several illegal aliens, including Noel Astorga-Mendosa, Juan Antonio Macias-Gallo, and Joel Flores-Chamorro, into the United States Border Patrol checkpoint on Highway 78 near Palo Verde, California.

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5. On or about August 15, 2008, MAYRA ALEJANDRA ZEPEDA received a phone call from EVELYNE RUIZ prior to entering the United States Border Patrol checkpoint on Highway 78 near Palo Verde, California.

All in violation of Title 18, United States Code, Section 371.

Count 2

On or about August 15, 2008, within the Southern District of California, defendants MAYRA ALEJANDRA ZEPEDA, EVELYNE RUIZ and PEDRO LEONIDES GUZMAN-ROSAS, with the intent to violate the immigration laws of the United States, knowing and in reckless disregard of the fact that an alien, namely, Joel Flores-Chamorro, had not received prior official authorization to come to, enter and reside in the United States, did bring to the United States said alien for the purpose of commercial advantage and private financial gain; in violation of Title 8, United States Code, Section 1324(a)(2)(B)(ii), and Title 18, United States Code, Section 2.

Count 3

On or about August 15, 2008, within the Southern District of California, defendants MAYRA ALEJANDRA ZEPEDA, EVELYNE RUIZ and PEDRO LEONIDES GUZMAN-ROSAS, with the intent to violate the immigration laws of the United States, knowing and in reckless disregard of the fact that an alien, namely, Joel Flores-Chamorro, had come to, entered and remained in the United States in violation of law, did transport and move, said alien within the United States in furtherance of such violation of law; in violation of Title 8, United States Code, Sections 1324(a)(1)(A)(ii) and (v)(II).

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Count 4

On or about August 15, 2008, within the Southern District of California, defendants MAYRA ALEJANDRA ZEPEDA, EVELYNE RUIZ and PEDRO LEONIDES GUZMAN-ROSAS, with the intent to violate the immigration laws of the United States, knowing and in reckless disregard of the fact that an alien, namely, Noel Astorga-Mendosa, had not received prior official authorization to come to, enter and reside in the United States, did bring to the United States said alien for the purpose of commercial advantage and private financial gain; in violation of Title 8, United States Code, Section 1324(a)(2)(B)(ii), and Title 18, United States Code, Section 2.

Count 5

On or about August 15, 2008, within the Southern District of California, defendants MAYRA ALEJANDRA ZEPEDA, EVELYNE RUIZ and PEDRO LEONIDES GUZMAN-ROSAS, with the intent to violate the immigration laws of the United States, knowing and in reckless disregard of the fact that an alien, namely, Noel Astorga-Mendosa, had come to, entered and remained in the United States in violation of law, did transport and move, said alien within the United States in furtherance of such violation of law; in violation of Title 8, United States Code, Sections 1324(a)(1)(A)(ii) and (v)(II).

Count 6

On or about August 15, 2008, within the Southern District of California, defendants MAYRA ALEJANDRA ZEPEDA, EVELYNE RUIZ and PEDRO LEONIDES GUZMAN-ROSAS, with the intent to violate the immigration laws of the United States, knowing and in reckless disregard of the fact that an alien, namely, Juan Antonio Macias-Gallo, had not received prior official authorization to come to, enter and reside in the

United States, did bring to the United States said alien for the purpose of commercial advantage and private financial gain; in violation of Title 8, United States Code, Section 1324(a)(2)(B)(ii), and Title 18, United States Code, Section 2.

Count 7

On or about August 15, 2008, within the Southern District of California, defendants MAYRA ALEJANDRA ZEPEDA, EVELYNE RUIZ and PEDRO LEONIDES GUZMAN-ROSAS, with the intent to violate the immigration laws of the United States, knowing and in reckless disregard of the fact that an alien, namely, Juan Antonio Macias-Gallo, had come to, entered and remained in the United States in violation of law, did transport and move, said alien within the United States in furtherance of such violation of law; in violation of Title 8, United States Code, Sections 1324(a)(1)(A)(ii) and (v)(II).

DATED: August 29, 2008.

A TRUE BILL:

Foreperson

KAREN P. HEWITT
United States Attorney

By:

HAROLD W. CHUN
Assistant U.S. Attorney